

**Remarks/Arguments:**

Various claims have been rejected under 35 U.S.C. § 101. The claims have been appropriately amended.

The present invention relates to a memory media. An exemplary memory media is illustrated as memory card 25 in Applicants' Fig. 2 (Substitute Specification, page 16, line 2). With regard to claim 1, as illustrated by Applicants' Fig. 1, Applicants' memory media includes a plurality of directories (e.g. directory 6, directory 7, etc.) that each store files of respectively specific file formats (Substitute Specification, page 11, line 9). Thus, for example, directory 6 only stores music files, directory 7 only stores still image files, etc. A further directory (e.g. directory 9) is included for storing files in any format different than the file format stored in the plurality of directories (Substitute Specification, page 11, line 10).

The above features are also illustrated by the enclosed Evidence Appendix. As can be seen, a plurality of directories are maintained at a common directory level. The first directory stores only files of a first type (e.g. doc files). The second directory stores only files of a second type (e.g. "xls" files). The third directory stores files of only a third type (e.g. "xlm" files). A further directory (indicated in the Evidence Appendix as "other") is for storing all file types for which there is not a directory for storing just that file type (in the example, "pdf", "tmp", etc.).

With regard to claim 6, an exemplary embodiment includes memory card 25 which is used with an information terminal such as Digital Still Camera 10 (Substitute Specification, page 14, line 11). The information terminal can form directories (e.g. directory 6, 7) at a common level where each directory is for files of one particular file format (one format per directory) (page 11, line 9) (page 17, line 9). A file having a format different than the formats of any of those directories is stored in a further directory (page 11, line 10).

With regard to claim 8, in an exemplary embodiment, if a file conforms to the format of any of a certain plurality of directories (directory 6, 7), then the file is stored in the respective directory (Substitute Specification, page 11, line 9). If the file does not conform to any of those formats, then the file is stored in a further directory (e.g. directory 9, page 11, line 10).

With regard to claim 32, in an exemplary embodiment, two types of directories are formed in memory card 25. Each directory of the first type is for storing files of one particular format (one format per directory) (Substitute Specification, page 11, line 9) (e.g., directory 6,

7). The second type of directory is for storing files having a format different than the formats of any of those directories (directory 9). A file is stored in one of the directories of the first type or the second type (page 17, line 17) (page 23, line 12).

With regard to claim 49, in an exemplary embodiment, memory card 25 is used with an information terminal such as printer 70 (Fig. 6 and Substitute Specification, page 14, line 11). The portable memory terminal has an interface (e.g. CPU 71) which reads data from memory card 82 (page 34, line 8). The portable memory terminal also has a selector for selecting between data stored in one of two types of directories of memory card 82 (Fig. 6, button 80) (page 31, line 7). Each directory of the first type is for storing files of one particular format (one format per directory) (page 11, line 9) (e.g., directory 6, 7). The second type of directory is for storing files having a format different than the formats of any of those directories (directory 9).

With regard to claim 52, an exemplary embodiment includes memory card 25 which includes a plurality of directories (e.g. directory 6, directory 7, etc.) that each store files of respectively specific file formats (Substitute Specification, page 11, line 9). Memory card 25 also includes a further directory for storing files having an arbitrary format (directory 9).

With regard to claim 53, an exemplary embodiment includes memory card 25 which includes a plurality of directories (e.g. directory 6, directory 7, etc.) that each store files of respectively specific file formats (Substitute Specification, page 11, line 9) and a further directory. The further directory stores files having the specific formats and files having other formats (page 13, line 8).

With regard to claim 54, in an exemplary embodiment, a method of managing files in an information apparatus including memory card 25 is provided. Memory card 25 includes a plurality of directories (e.g. directory 6, directory 7, etc.) that each store files of respectively specific file formats. The method includes the step of detecting whether a file can be stored in one of the specific format directories (page 22, line 12). If the file cannot be stored in any of the specific format directories, a new directory is formed (page 23, line 9). The new directory is capable of storing files of arbitrary formats (directory 9).

With regard to claim 55, in an exemplary embodiment, a method of managing files in an information apparatus including memory card 25 is provided. Memory card 25 includes a plurality of directories (e.g. directory 6, directory 7, etc.) that each store files of respectively

specific file formats. The method includes the step of detecting whether a file having a predetermined format can be stored in one of the specific format directories (page 22, line 12). If the file cannot be stored in any of the specific format directories, a further limited directory is formed. The further directory is capable of storing files having the predetermined format (page 17, line 9).

With regard to claim 56, in an exemplary embodiment, a method of reading information from a file stored on memory card 25 is provided. Memory card 25 includes a plurality of directories (e.g. directory 6, directory 7, etc.) that each store files of respectively specific file formats (Substitute Specification, page 11, line 9) and a further directory. The further directory stores files having arbitrary formats (directory 9). The method includes a first step of accessing the directory corresponding to the format of the file being read (Substitute Specification, page 30, line 4) and the second step of accessing the further directory (page 32, line 1).

With regard to claim 57, in an exemplary embodiment, a method of reading information in a file stored on memory card 25 is provided. Memory card 25 includes a plurality of directories (e.g. directory 6, directory 7, etc.) that each store files of respectively specific file formats (Substitute Specification, page 11, line 9) and a further directory. The further directory stores files having the specific formats and files having other formats (page 13, line 8). The method includes a first step of accessing the directory corresponding to the format of the file being read (Substitute Specification, page 30, line 4) and a second step of accessing the further directory (page 32, line 1).

With regard to claim 59, an exemplary embodiment includes a CPU which is capable of giving instructions to store a file obtained from memory card 54 (CPU 41 of Fig. 4). The exemplary embodiment further includes a controller (e.g. CPU 41 of Fig. 4) (Substitute Specification, page 23, lines 7-11) which is capable of forming a directory in memory card 54 and storing the obtained file in memory card 54. If memory card 54 has directories formed by a further apparatus but does not have a directory formed by the present apparatus (page 75, lines 11-12), the present apparatus forms a new directory in memory card 54. The new directory is capable of storing arbitrary file formats (directory 9).

With regard to claim 65, in an exemplary embodiment, a method of storing a file in memory card 54 is provided. The method includes a step of storing a file in a memory of an

apparatus. Memory card 54 has directories formed by a further apparatus but does not have a directory formed by the present apparatus. (page 75, lines 11-12) (page 76, line 1). The method further includes the step of recognizing memory card 54 and forming in a new directory in memory card 54 (page 76, line 1). The new directory will be capable of storing arbitrary file formats (e.g., directory 9). The method further includes the step of storing the file in the new directory (e.g., page 23, line 12).

With regard to claim 71, in an exemplary embodiment, an information terminal, such as a digital camera, for use with memory card 25 is provided. The information terminal has memory card slot 24 for receiving memory card 25 (Fig. 2). Further, the information terminal has its own memory, separate from memory card 25, that can store files (e.g. flash memory 16). The information terminal also has a controller that can form a directory in memory card 25 and store a file in the information terminal's own memory (e.g. CPU 15). If the memory card already has a directory for storing files from a further information terminal but does not have a directory for storing files from the present information terminal, the information terminal forms a new directory in memory card 25 (e.g. Substitute Specification, page 76, line 9). The new directory is capable of storing arbitrary file formats (e.g. directory 9).

With regard to claim 77, in a exemplary embodiment, a method of storing a file in memory card 25 is provided. Memory card 54 has directories formed by a further apparatus but does not have a directory formed by the present apparatus. (page 75, lines 11-12) (page 76, line 1). The method includes the step of storing a file in a memory of the present apparatus (e.g. flash memory 16, Fig. 2). The method further includes the steps of recognizing memory card 54 and forming a new directory in memory card 54. The new directory corresponds to files having arbitrary formats (directory 9). The method further includes the step of storing the file in the new directory (e.g., page 23, line 12).

Claims 1, 3, 5, 50 and 51, 52, and 53-76 have been rejected under 35 U.S.C. § 102(e) as being anticipated by Black et al. (US 7,103,602). Claims 4, 6, 8, 12, 14-31, 32-48, and 77-82 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Black in view of Iida (US 6,662,269). Claims 44-45 have been rejected under 35 U.S.C. § 103(a) as being unpatentable over Black (US 7, 103,602) in view of Iida (US 6, 662,269) and further in view of Ito (US 2005/0219559).

In the interest of improving the readability of the argument, Applicants' representative will discuss the pending independent claims in two separate groups as follows:

Group I: Claims 1, 6, 8, 32, 49, and 52-57; and

Group II: Claims 59, 65, 71 and 77.

Regarding Group I, these claims are patentable over the art of record. The remaining independent claims in Group 1, while not identical to Group I, are also patentable for reasons similar to those set forth below with regard to claim 1.

Applicants' invention, as recited by claim 1, includes features which are neither disclosed for suggested by the art of record, namely:

... a plurality of directories at a directory level, each of said directories limited to storing files of a respective one of a plurality of file formats, so that not more than said respective one of said plurality of file formats are permitted to be stored in each of said directories, and

a further directory at said directory level, said further directory for storing files in other than said plurality of file formats ... (emphasis added)

Thus, claim 1 is reciting a plurality of directories and a further directory which are all at the same level within a directory (e.g. tree) structure. Of the plurality of directories, each of those directories stores "a respective one of a plurality of file formats. The further directory stores files in formats different than the formats stored in the "plurality of directories."

An exemplary embodiment of the above structure is illustrated in the Evidence Appendix.

The illustration in the Evidence Appendix shows a "plurality of directories" which are each limited to storing one respective file format. Thus, for example, one directory stores files in the .doc format. A second directory, for example, stores files in the .xls format. A third directory stores files in the .xlm format. A further directory is also shown. The further directory stores files having formats different than the formats stored in the "plurality of directories." The plurality of directories and the further directory are all at the same level within the directory structure.

The Official Action states that the feature of each directory "limited to" follows a respective file format is disclosed in Black in Fig. 3 as elements 56 and 60. Element 56 is a block of a flow chart which questions "is there attachment to the e-mail data file?" Element 60 of Fig. 3 includes the step of "identifying the file type of the user data file." Neither the determination of whether an e-mail data file includes an attachment or the identification of a file type has anything to do with Applicants' claimed feature of directories "limited to" respective file formats. Accordingly, the rejection is improper. Withdrawal of the rejection is respectfully requested.

The other independent claims of Group 1 are patentable for reasons similar to those set forth above with regard to claim 1.

Regarding Group II, Appellants representative will first discuss claim 59.

Applicants' claim 59 includes a feature which is neither disclosed nor suggested by the art of record, namely:

... a controller operable to form a directory in the carryable memory media ...

wherein ... if a directory formed by an other apparatus is stored in the carryable memory media and there is not a directory formed by the apparatus in the carryable memory media, the apparatus makes the carryable memory media form a new directory which is allowed to store an arbitrary file stored in the memory ...

Thus, when, for example, a memory card is moved from a first apparatus to a second apparatus and the second apparatus stores a file in the memory card, the file will be stored in a directory different from any directories created by the first apparatus.

The Official Action argues that the above feature is disclosed in Black as elements 26 and 28. Element 26 is identified as a "file data base." Element 28 is identified as a "file logging processor." The prior art disclosure of a data base and a logging processor has absolutely no relevance to Applicants' claimed feature of forming "a new directory" to "store the obtained file" formed by an apparatus other than the apparatus which formed directories in the memory media. As this feature is neither disclosed nor suggested by Black, claim 59 is patentable over Black.

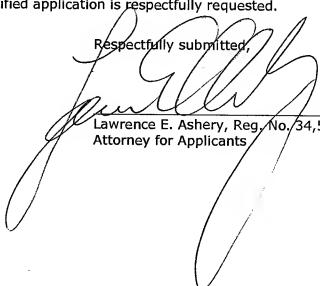
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The remaining independent claims in Group II, while not identical to claim 59, are similarly allowable over the art of record for reasons similar to those set forth above with regard to claim 59.

Allowance of the above-identified application is respectfully requested.

Respectfully submitted,



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LEA/dmw

Enclosure: Appendix

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**EVIDENCE APPENDIX**

Directory  
Level

|  |   |
|--|---|
|  | .doc                                      |
|  | .xls                                      |
|  | .xlm                                      |
|  | other formats<br>(e.g. - .pdf, tmp, etc.) |